

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MIDDLE EAST FORUM,

Plaintiff,

v.

LISA BARBOUNIS,

Defendant.

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: CIVIL ACTION
: NO. 2:19-cv-05697-JS
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**DEFENDANT, LISA BARBOUNIS' REQUEST TO ALLOW HER MOTION FOR
SUMMARY JUDGMENT MEMORANDUM TO EXCEED 15 PAGES**

Defendant, Lisa Reynolds-Barbounis requests the Court allow her Motion for Summary Judgment, Memorandum, to exceed 15 pages,

1. Defendant filed her motion for summary judgment on October 14, 2021.
2. Defendant's Memorandum of law that accompanied her Motion is about 23 pages (it is 25 pages however, the first and last page are a cover sheet, or conclusion statement).
3. Defendant's Motion had to address all eight (8) counts that Plaintiff filed in Plaintiff's forty-one page (with exhibits) civil action complaint.
4. Defendant's motion if granted would be dispositive to every count presented by Plaintiff.
5. If the Court denies this request, Defendant will endeavor to reduce the page number to 15 pages, however, Defendant requests that the Court allow Defendant's motion to stand as filed.

6. Defendant apologizes to the Court for filing this request after the dispositive motion was filed.

WHEREFORE, Defendant respectfully requests that the Court grant Defendant's Motion and allow her Memorandum of law that accompanied her dispositive motion to stand as written at 23 pages of text.

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Counsel for Plaintiff

DATED: October 21, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this date that I caused a true and correct copy of Defendant's Motion to be served via ECF.

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DATED: October 21, 2021